

MEMO

TO: Community, Economic, and Human Development Committee
FROM: Lynn Harris, Manager, Community Development, (213) 236-1875,
harris@scag.ca.gov
DATE: September 2, 2004
SUBJECT: Intergovernmental Review (IGR) of Glendale Town Center Project

RECOMMENDED ACTION: Information only.

SUMMARY:

Intergovernmental review (IGR) staff periodically updates the Committee on IGR activity. This update describes the IGR comments to the Glendale Town Center project. The Glendale Town Center project proposes the development of approximately 475,000 square feet of retail-commercial uses, 338 residential dwelling units, a public park, and other pedestrian open space elements on a 15.5-acre site.

BACKGROUND:

As the areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations (California Public Resources Code Sections 21083 and 21087 and Presidential Executive Order 12,372). Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

The Glendale Town Center project proposes the development of approximately 475,000 square feet of retail-commercial uses, 338 residential dwelling units, a public park, and other pedestrian open space elements on a 15.5-acre site. The project is located in the Central Glendale Redevelopment Project Area and is bound by Brand Boulevard to the east, Colorado Street to the south, Central Avenue to the west, and the Galleria II parking structure to the north.

SCAG received the Draft Environmental Impact Report (EIR) for the Glendale Town Center project on December 23, 2003. IGR staff issued a letter dated January 14, 2004, stating that the project was not regionally significant. The Notice of Preparation for a Draft EIR for the proposed project indicated that the proposed project would be less than the regionally significant thresholds of 500 dwelling units or 500,000 square feet of floor area for a business establishment or a shopping center. The January 14, 2004 letter is attached.



**SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS**

MEMO

It was brought to IGR staff attention that the proposed project would include more than 1,000 employees. The California Environmental Quality Act (CEQA) Guidelines (Section 15206) state that projects employing more than 1,000 people are regionally significant. CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. Upon concluding that the Glendale Town Center project was a regionally significant project, IGR staff issued a second comment letter on March 17, 2004. This second letter requested that the Glendale Redevelopment Agency specifically cite in its Final EIR the appropriate SCAG policies and address the manner in which the project is consistent with applicable core policies or supportive of applicable ancillary policies. This letter also is attached.

The Glendale Redevelopment Agency responded to both of SCAG's comment letters in the Glendale Town Center Final Environmental Impact Report. The responses state that the project is consistent with SCAG policies in the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The responses address the project's consistency with SCAG policies concerning growth management, mobility, air quality, and water quality. The responses to the SCAG comment letters are attached.

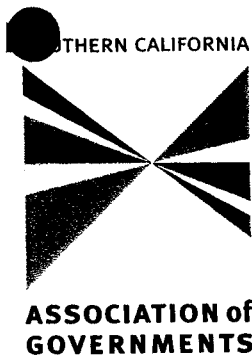
ATTACHMENTS:

1. SCAG comment letter dated January 14, 2004
2. SCAG comment letter dated March 17, 2004
3. Glendale Redevelopment Agency response to SCAG comment letter dated January 14, 2004
4. Glendale Redevelopment Agency response to SCAG comment letter dated March 17, 2004

FISCAL IMPACT: All work related to this memo is contained within the FY04-05 work program.



**SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS**



Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

January 14, 2004

Mr. Mark Berry
Redevelopment Project Manager
Glendale Redevelopment Agency
633 E. Broadway, Suite 201
Glendale, CA 91206

RE: SCAG Clearinghouse No. I 20030727 Glendale Town Center Project

Dear Mr. Berry:

Thank you for submitting the **Glendale Town Center Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Glendale Town Center Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units, or a proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **December 16-31, 2003** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

March 17, 2004

Mr. Mark Berry
Redevelopment Project Manager
Glendale Redevelopment Agency
City of Glendale
633 E. Broadway, Suite 201
Glendale, CA 91206

RE: **Glendale Town Center – SCAG No. I 20020522, 20030727**

Dear Mr. Berry:

In January 2004, SCAG provided a letter to you regarding our review of the **Glendale Town Center Draft Environmental Impact Report**. At that time, SCAG determined that the proposed Project was not regionally significant because the Notice of Preparation for a Draft EIR for the proposed Project indicated that the proposed Project included less than 500 dwelling units and the proposed Project would encompass less than 500,000 square feet of floor area for a business establishment or a shopping center.

However, it has been brought to our attention that the proposed Project would include more than 1,000 employees. The **California Environmental Quality Act (CEQA) Guidelines (Section 15206)** includes criteria for projects of regional significance. Although the proposed Project includes less than 500 dwelling units and 500,000 square feet of floor area, as stated above, the proposed Project will employ more than 1,000 people. **Based on this information the proposed Project is regionally significant.** CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and **regional plans (Section 15125 [d])**. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan, which may be applicable to your project, are outlined in the attachment. **We expect the Final EIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your Final EIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.**

As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

Please provide a minimum of 45 days for SCAG to review the Final EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

**COMMENTS ON THE PROPOSAL TO DEVELOP A
ENVIRONMENTAL IMPACT REPORT
FOR THE
GLENDALE TOWN CENTER
SCAG NO. I 20020522, 20030727**

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Final EIR for the Glendale Town Center.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The Draft EIR should reflect the most current SCAG forecasts which are the 2001 RTP (April 2001) Population, Household and Employment forecasts for the Arroyo Verdugo subregion and the City of Glendale. These forecasts follow:

A. VERDUGO						
SUBREGION	2000	2005	2010	2015	2020	2025
POPULATION	399,130	427,250	438,666	449,889	465,121	480,849
HOUSEHOLD	145,580	152,398	158,072	163,776	170,203	180,069
EMPLOYMENT	211,375	226,334	241,792	250,935	259,288	268,174

CITY OF						
GLENDALE	2000	2005	2010	2015	2020	2025
POPULATION	198,849	210,483	212,713	214,906	217,881	220,954
HOUSEHOLD	71,829	75,271	75,545	75,821	76,132	76,608
EMPLOYMENT	90,154	94,684	99,366	102,135	104,665	107,356

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- 3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- 3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*
- 3.15 *Support local jurisdictions strategies to establish mixed-use clusters and other*

transit-oriented developments around transit stations and along transit corridors.

- 3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*
- 3.18 *Encourage planned development in locations least likely to cause environmental impact.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care,*

social services, recreational facilities, law enforcement, and fire protection.

REGIONAL TRANSPORTATION PLAN

The **Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators:

Mobility - *Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.*

- *Average Work Trip Travel Time in Minutes – 25 minutes (Auto)*
- *PM Peak Freeway Travel Speed – 45 minutes (Transit)*
- *PM Peak Non-Freeway Travel Speed*
- *Percent of PM Peak Travel in Delay (Fwy)*
- *Percent of PM Peak Travel in Delay (Non-Fwy)*

Accessibility - *Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- *Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)*
- *Average transit access time*

Environment - *Transportation system should sustain development and preservation of the existing system and the environment. (All Trips)*

- *CO, ROG, NOx, PM10, PM2.5 – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements*

Reliability – *Transportation system should have reasonable and dependable levels of service by mode. (All Trips)*

- *Transit – 63%*
- *Highway – 76%*

Safety - Transportation systems should provide minimal accident, death and injury. (All Trips)

- Fatalities Per Million Passenger Miles – 0
- Injury Accidents – 0

Equity/Environmental Justice - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)

- By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles

Cost-Effectiveness - Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety

- Return on Total Investment – Optimize return on Transportation Investments

4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.

4.04 Transportation Control Measures shall be a priority.

4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.

4.18 Each county should provide environmentally acceptable airport capacity within its own market area to meet local and domestic air passenger demand.

AIR QUALITY CHAPTER CORE ACTIONS

The **Air Quality Chapter** core actions related to the proposed project includes:

5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.

5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

CONCLUSIONS

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

- - -
ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

SCAG is a **Joint Powers Agency** established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's **Metropolitan Planning Organization** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134(g)-(h), 49 U.S.C. '1607(f)-(g) et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated **Regional Transportation Planning Agency**, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the **South Coast Air Quality Management Plan**, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a **Co-Lead Agency** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining **Conformity** of Projects, Plans and Programs to the Air Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for **reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans** required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for **Inter-Governmental Review** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, **Environmental Impact Reports** of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

3.2 Written Comment Letters

REGIONAL AGENCIES

Letter No. 2: Southern California Association of Governments (SCAG)

Response 1

Please note that Agency reviewed the proposed Glendale Town Center against the criteria in Section 15206 of the CEQA *Guidelines* that define Regionally Significant Projects. As described in the Draft EIR Project Description on page 3.0-18, it is estimated that the Project will provide up to 1,756 full and part-time employment opportunities. Since the Project will provide more than 1,000 employment opportunities, the Agency provided analysis of the consistency of the Project with the SCAG *Regional Comprehensive Plan and Guide* (RCP&G) in Section 4.1, Land Use and Planning of the Draft EIR.

3.2 Written Comment Letters

Letter No. 3: Southern California Association of Governments (SCAG)

Response 1

The Draft EIR Land Use and Planning Section included analysis of the consistency of the Project with SCAG RCP&G Policies 3.01, 3.05, 3.12, 3.14, and 3.23. The conclusion of this analysis is that the Project is consistent with these policies. The additional policies contained in the RCP&G and Regional Transportation Plan (RTP) identified in this letter are listed below followed by a discussion of the consistency of the Project with these policies.

Growth Management Chapter

The purpose of the Growth Management Chapter of the RCP&G is to present forecasts that establish the socio-economic parameters for the development of various functional chapters of the RCP&G. Another purpose of the chapter is to address the complex issues related to growth and land consumption, and to suggest guiding principals for development that are supportive of the strategic goals of the RCP&G.

Those policies identified in this comment not already addressed in the Draft EIR are addressed below:

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

3.09 *Support local jurisdiction's efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

Analysis: The Project site is located in a developed portion of City of Glendale that is currently served by existing public facilities, utilities and public facilities. As a result, municipal services and utilities are available to serve the Proposed Project. The analysis in the Draft EIR demonstrates that the utility and public services needed to serve the Project can be provided. The Project would generate revenue in the form of sales taxes, property taxes, fees, etc., which would be available to the City to fund public services to serve this Project and the City as a whole, such as fire and police service, flood control, library service, street maintenance, etc. Revenues for capital improvements would also be generated by the Project directly through various forms of development fees, including, but not limited to water connection fees, sewer connection fees, and school fees. Therefore, the Project is considered consistent with these policies.

3.10 *Support local jurisdiction's actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

3.2 Written Comment Letters

Analysis: The proposed Glendale Town Center Project includes a request for approval of a Specific Plan. The proposed Glendale Town Center Specific Plan incorporates development and use standards tailored to the mix of commercial and residential uses proposed and the architectural and site design of the Proposed Project. The purpose of the Specific Plan is to fulfill the goals of both the City's Comprehensive General Plan and the Redevelopment Plan for the Central Glendale Redevelopment Project Area. The Specific Plan includes development standards defined for this Project that will expedite subsequent permitting and minimize the amount of additional review required by the City. As a result, the Project is considered consistent with this policy.

3.15 *Support local jurisdictions strategies to establish mixed-use clusters and other transit oriented developments around transit stations and along transit corridors.*

3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

Analysis: The development of the Glendale Town Center will provide a mixed-use project containing residential, commercial, open space and public recreational uses in an area presently served by public transit and containing a regional transportation system. Approximately 15 bus lines provide service in the immediate vicinity of the Proposed Project. These routes include stops at the Glendale Transportation Center, which provides access to the greater Los Angeles Metropolitan region via bus and commuter trains as well as statewide access via Amtrak long distance trains.

The Project site is located in an under utilized area of downtown Glendale. As such, the Project will promote stability of the downtown area by replacing vacant buildings and limited commercial development with a mixed-use project containing residential and commercial uses. In addition, the Project will enhance downtown Glendale's designation as a regional commercial center by creating a diversity of commercial uses. Based on the above, the Project is considered consistent with these policies.

3.18 *Encourage planned development in locations least likely to cause environmental impact.*

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

Analysis: The Project site is located in a developed portion of downtown Glendale and the Project involves the redevelopment of a portion of the downtown. This redevelopment activity avoids impacts to natural resources present in the undeveloped areas of the City such as wetlands, groundwater recharge

3.2 Written Comment Letters

areas, woodlands and land containing unique and endangered plants or animals. The Draft EIR includes comprehensive analysis of potential environmental impacts that demonstrates that the Project is proposed in a location in downtown that minimizes impacts due to the characteristics of the site and the surrounding area. Through compliance with applicable regulations and codes, potential impacts such as hazards associated with seismic events would be reduced to less than significant levels. The Project is consistent with these RCPG policies.

- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

Analysis: The Project site has been disturbed by previous development activity. As a result, surficial evidence of prehistoric or historic cultural resources have either been disturbed or covered over. There is a remote possibility of deeply buried resources being uncovered during excavation. Compliance with mitigation measures identified in Section 4.9 of the Draft EIR would reduce the potential for any significant impact to unrecorded cultural resources. The Project is consistent with this policy.

- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

Analysis: The Project site is not subject to flood hazards, wildland fire hazards, nor does the property contain any steep slopes. Like other locations in Southern California, the site would be subject to seismic hazards common to the region. Through compliance with the applicable requirements and standards in the Uniform Building Code hazards to the Project associated with seismic events would be reduced to less than significant levels making the Project consistent with this SCAG policy.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*

Analysis: The City of Glendale is aggressively pursuing a wide variety of housing opportunities for the full range of economic levels within the City. The Project will expand the range and type of housing available in the City by providing apartments and condominium units in downtown Glendale. Since the Project is located in the Central Redevelopment Plan Area, 20 percent of the tax increment generated by the Proposed Project will be directed toward affordable housing projects and programs administered by the City's Community Development and Housing Division. For these reasons, the Proposed Project is considered consistent with these policies.

3.2 Written Comment Letters

- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide equally to all members of society, accessible and effective services, such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

Analysis: The Project site is located in a developed portion of City of Glendale with a full range of infrastructure and municipal services afforded to the sites. In addition to developer fees and construction related infrastructure improvements, the residents and businesses in the Project would generate revenue in the form of sales taxes, property taxes, fees, etc., which would be available to fund the recurring costs associated with provision of municipal services to the Project and the City as a whole. Revenues for capital improvements would also be generated by the Project directly through various forms of development fees. The Project is consistent with this RCPG policy.

Regional Mobility Chapter

The Regional Mobility Chapter is a summary of the SCAG Regional Mobility Element (RME). The RME, adopted in 2001, is the principal transportation policy, strategy and objective statement of SCAG, proposing a comprehensive strategy for achieving mobility and air quality mandates. The RME is also referred to as the Regional Transportation Plan (RTP), as it serves as both the federal- and state-required regional long-range transportation plan for the SCAG region through the year 2025.

The Regional Mobility Element links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic, and commercial limitations. Those policies identified in this comment not already addressed in the Draft EIR are addressed below:

- 4.01 *Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*

Mobility – Transportation systems should meet the public need for improved access, and for safe, comfortable, convenient, faster, and economical movements of people and goods.

- Average work trip travel time in minutes – 25 minutes (Auto);
- PM peak freeway travel speed – 45 minutes (Transit);
- PM peak non-freeway travel speed;
- Percent of PM peak travel in delay (Fwy); and
- Percent of PM peak travel in delay (Non-Fwy).

3.2 Written Comment Letters

Accessibility – Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.

- Work opportunities within 45 minutes door to door travel time (Mode Neutral); and
- Average transit access time.

Environment – Transportation systems should sustain development and preservation of the existing system and the environment. (All Trips)

- CO, ROG, NO_x, PM₁₀, PM_{2.5} – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements.

Reliability – Transportation system should have reasonable and dependable levels of service by mode. (All Trips)

- Transit – 63 percent; and
- Highway – 76 percent.

Safety – Transportation systems should provide minimal accident, death and injury. (All Trips)

- Fatalities per million passenger miles – 0; and
- Injury accidents – 0.

Equity/Environmental Justice – The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All Trips)

- By income groups share of net benefits – Equitable distribution of benefits among all income quintiles.

Cost-Effectiveness – Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety.

- Return on total Investment – Optimize return on Transportation Investments.

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- 4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*
- 4.04 *Transportation Control Measures shall be a priority.*
- 4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity.*
- 4.18 *Each County should provide environmentally acceptable airport capacity within its own market area to meet local and domestic air passenger demand.*

Analysis: These core transportation policies address regional transportation planning. It is beyond the scope of an individual project to address the regional transportation issues raised in these policies. To the extent applicable, the Proposed Project is considered consistent with the intent of these policies, however. For example, the Project would accommodate growth in an area already afforded municipal services and public transportation. The physical design and mixed-use nature of the Glendale Town Center promotes pedestrian circulation. Finally, mitigation has been identified in the Final EIR that will reduce all traffic impacts of the Project to the fullest extent feasible. Consequently, the Project would be consistent with these policies to maintain a reliable transportation network that provides for the safe, comfortable, and economical movement of people and goods.

Air Quality Chapter

The Air Quality Chapter of the RCP&G was written by SCAG to support the goals of the RCPG and is intended to facilitate an improved standard of living by encouraging sustained economic growth along with an improvement in air quality through the creation of new industries and products required to achieve cleaner air and by providing adequate transportation for all residents while meeting clean air goals.

The Project's consistency with the requirements of the South Coast Air Quality Management District's (SCAQMD) *Air Quality Management Plan (AQMP)* is discussed in the Air Quality section of the Draft EIR. As stated in the Air Quality Chapter, SCAG is responsible for preparing and approving the portions of the AQMP which relate to regional demographic projections and integrated regional land use; housing, employment, and transportation programs; control measures; and strategies. The RCP&G Air Quality Chapter presents a series of air quality "issues" and "strategies."

The following policies address those issues presented in the Air Quality Chapter that are relevant to the Proposed Project.

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- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle miles traveled/emission fees) so that options to command and control regulations can be assessed.*

Analysis: This core policy is directed towards regional air quality planning. It is beyond the scope of an individual project to address the regional issues raised in this policy. To the extent applicable, the Proposed Project is considered consistent with the intent of this policy by accommodating growth in an area already served by public transportation. The Project is considered consistent with this policy.

- 5.11 *Through the environmental documentation review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

Analysis: The design of the Glendale Town Center emphasizes the importance of mixed land uses, pedestrian scale, and physical design in creating a community that people would want to live, work and shop in. The Proposed Project will incorporate residential units in an urban setting in a Project designed to reinforce and encourage pedestrian movement.

The location and design of the Project also promotes the use of alternative means of transportation. The Project is in area served by 15 bus lines. These routes include stops at the Glendale Transportation Center. The GTC provides access to the greater Los Angeles Metropolitan region via bus and commuter trains and also provides statewide access via Amtrak long distance trains. As such, future residents of the Project have the opportunity to utilize several alternative modes of transportation including bus and rail service. In conclusion, physical design features of the Project along with the location near an area served by existing transit act to reduce total vehicle miles traveled and hence, vehicle air emissions. Although the Proposed Project has no control over the contents of Regional, subregional, and local plans that affect development are identified in this Draft EIR and the consistency of the Project with this plans is provided. For these reasons, the Project is considered consistent with these policies.

Water Quality Chapter

The stated purpose of this chapter is to provide a regional perspective on current water quality issues and the plans and programs for addressing these issues. The chapter also identifies the current water quality goals and objectives for the region under existing law and provides a framework for ensuring that

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growth in wastewater treatment capacity is consistent with regional growth projections. Policies of the Water Quality Chapter, which have some relevance to the Proposed Project, are discussed below:

11.07.1 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

Analysis: the City of Glendale has a sizeable source of reclaimed water available for use, and has recently completed a reclaimed water distribution system. The use of reclaimed water is important as it frees potable water in the City's system to be used to satisfy other water users. The Glendale Town Center will be served by this existing reclaimed water system. Therefore, the Project is consistent with this policy.

All feasible mitigation measures proposed within the Draft EIR will be implemented through the preparation and adoption of a Mitigation Monitoring and Reporting Program.